

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No.: 1:24-cv-21929-Bloom

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

_____ /

**MOTORSPORT GAMES INC.'S RESPONSE
TO PLAINTIFF'S FIRST REQUEST FOR ADMISSION**

Defendant Motorsport Games Inc. ("MSG"), pursuant to Fed. R. Civ. P. 36, hereby responds to Plaintiff Zachary Griffin First Request for Admissions as follows:

ANSWERS TO REQUESTS FOR ADMISSION

1. Admit that Motorsport Games Inc. and Motorsport Games Australia Pty Ltd are independent entities.

ANSWER:

Denied.

2. Admit that Motorsport Games Australia Pty Ltd has no offices in the United States.

ANSWER:

Admitted.

3. Admit that your CEO, Dmitry Kozko, requested Plaintiff to relocate from Australia to MSG's office in Miami, Florida.

ANSWER:

Denied as Plaintiffs desire to relocate was part of a joint discussion and not a unilateral request.

4. Admit that you required Plaintiff to use the services of Mark Katsman to obtain a visa to the United States.

ANSWER:

Denied.

5. Admit that you suggested that Plaintiff use the services of Mark Katsman to obtain a visa to the United States.

ANSWER:

Admitted.

6. Admit that you applied for a corporate lease for an apartment in Miami for Plaintiff.

ANSWER:

Admitted.

7. Admit that in October 2022, you were aware of Plaintiff's financial losses as a result of the unsuccessful transfer to MSG's office in Miami.

ANSWER:

Denied.

8. Admit that in October 2022, you agreed to compensate Plaintiff for his losses.

ANSWER:

Denied.

9. Admit that you retained Cammisa Markel PLLC to obtain a work visa for Plaintiff.

ANSWER:

Denied, but MSG paid the retainer fee to Cammisa Markel PLLC on behalf of Zachary Griffin.

Dated: December 9, 2024.

Respectfully submitted,

AXS LAW GROUP, PLLC
2121 NW 2nd Avenue,
Suite 201
Miami, FL 33127
Tel: 305.297.1878

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess
jeff@axslawgroup.com
eservice@axslawgroup.com

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the forgoing was served via email on counsel of record of in this action on this 9th day of December 2024.

/s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess